

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 4:24-cr-308-HEA
)	
RONALD SIMPSON,)	
)	
Defendant.)	

UNOPPOSED MOTION TO TRAVEL

Defendant Ronald Simpson, by and through counsel, moves this Court for permission to travel from the Eastern District of Missouri to Destin, Florida, from December 12 through December 16. In support of this motion, Defendant states as follows:

1. Defendant wishes to travel to Destin, Florida, on December 12.
2. If permitted to travel, Defendant will stay at 122 Seascape Drive in Miramar Beach, Florida, and return to the Eastern District of Missouri on December 16.
3. Defendant will travel with his wife and attend the holiday party of his wife's employer, Real Joy Vacations, a vacation condominium rental business located in Destin, Florida, which owns the property where Defendant and his wife will stay.
4. Defendant has been on bond for almost six months and has incurred no violations.
5. Defendant, through counsel, has discussed this matter with pretrial services officer Anthony Byrd.
6. Mr. Byrd does not oppose Defendant's request.
7. Defendant, through counsel, has also discussed this matter with assistant United States attorney Derek Wiseman.

8. Mr. Wiseman does not oppose Defendant's request.

For the reasons above, Defendant respectfully requests this Court permit him to travel from the Eastern District of Missouri to Destin, Florida, from December 12 through December

16

Respectfully submitted,

By: */s/ ADAM FEIN*

Adam Fein
Attorney for Defendant
120 S. Central Avenue, #130
Clayton, MO 63105
(314) 862-4332
afein@rsfjlaw.com

CERTIFICATE OF SERVICE

I certify that on December 4, 2024, this document was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Derek J. Wiseman, Assistant United States Attorney.